

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

IN RE:

In Re: Alimjon, Inc.

Debtor(s)

Case No: 24-02200

**Judge: Honorable Deborah L. Thorne
Chapter 11**

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on Wednesday February 28, 2024, at 10:30 am, I will appear before the Honorable Judge Thorne, or any judge sitting in that judge's place, either in courtroom 682 of the Dirksen Courthouse, 219 S. Dearborn, Chicago, IL 60604, or electronically as described below, and present the motion of Debtor's Application To Employ Steven A. Leahy as General Counsel for the Debtor-in-Possession, a copy of which is attached. Important:

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link:
<https://www.zoomgov.com/join>. Then enter the meeting ID and passcode.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 160 9362 1728. The meeting ID and passcode can also be found on the judge's page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

By:

/s/ Steven A. Leahy
Steven A. Leahy

CERTIFICATE OF SERVICE

I, Steven A. Leahy, certify [if an attorney]/declare under penalty of perjury under the laws of the United States of America [if a non-attorney] that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on February 20, 2024, on or before 5:00 pm.

-

/s/ Steven A. Leahy
Steven A. Leahy

The Law Office of Steven A. Leahy, PC
2525 Waukegan Road, Suite 210
Bannockburn, Illinois 60015
(312) 664-6649
Attorney No: 6273453

Creditor Matrix: Via US Mail

Ailco
W222N833 Cheaney Rd
Waukesha, WI 53186

ALLY Co.
P.O. Box 9001951
Louisville, KY 40290

BMO Harris
PO Box 35707
Billings, MT 59107

BMO Harris
620 Market St One Center Sq
Knoxville, TN 37902

BMO Harris
PO Box 71951
Chicago, IL 60694

BMO Harris
620 Market St One Center Sq
Knoxville, TN 37902

BMO Harris
PO Box 71951
Chicago, IL 60694

FNCB Bank
100 South Blakely Street
Dunmore, PA 18512

M2 Equipment Finance
20800 Swenson Drive Suite 475
Waukesha, WI 53186

Mack Fin Services
3388 Founders Road Suite 100
Indianapolis, IN 46268

PNC Equipment Finance
655 Business Center Drive
Horsham, PA 19044

Small Business Administration
Administrator
Small Business Administration
Washington, DC 20416

Volvo Financial Service
P.O. Box 70899
Charlotte, NC 28272

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IN RE:

Alimjon, Inc.

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Chapter 11

**APPLICATION TO EMPLOY STEVEN A. LEAHY AS GENERAL
BANKRUPTCY COUNSEL FOR THE DEBTOR IN POSSESSION**

Now comes the proposed Counsel for the Debtor in Possession, Steven A. Leahy (the “Attorney”), for his **Application to Employ Steven A. Leahy as General Bankruptcy Counsel for the Debtor-in-Possession**. In support, he states as follows.

1. The Debtor filed a bankruptcy case seeking relief under Chapter 11 on February 16, 2024.
2. The Debtor-in-Possession seeks to have an effective reorganization under Chapter 11.
3. The Debtor-in-Possession's retention of the Attorney is reasonably necessary for an effective reorganization for the following reasons:
 - a. The Debtor-in-Possession has a large amount of debt that it is unable to manage without the assistance of the Attorney.
 - b. The Debtor-in-Possession and the Attorney have spoken at length about specific strategies to reorganize under Chapter 11, and the Attorney is the most familiar with the approved strategies and the Debtor-in-Possession's situation.
 - c. The Debtor-in-Possession is unable to formulate a working Chapter 11 Plan without the assistance of the Attorney.
4. The Attorney will charge \$600 per hour for services rendered to the Debtor-in-Possession, Paralegal time will be billed out at \$175 per hour.

5. The Debtor in Possession and the Attorney signed a proposed retainer agreement indicating all of the terms and conditions of the Attorney's proposed representation. (*See*, Exhibit A, Proposed Retainer Agreement).

6. The Attorney is a disinterested person because he:

- a. Is not a pre-petition creditor, equity security holder, or insider concerning the Debtor-in-Possession.
- b. Was not within 2 years before the date of the filing of the petition a director, officer, or employee of the Debtor-in-Possession; and
- c. Does not have an interest materially adverse to the interest of the estate or any class of creditors or equity security holders, because of any direct or indirect relationship to, connection with, or interest in, the Debtor-in-Possession, or for any other reason.

7. The Attorney holds no adverse interest to the Debtor-in-Possession.

WHEREFORE, Attorney Steven A. Leahy, asks this Court to grant the Debtor in Possession's Proposed Counsel's **Application to Employ Steven A. Leahy as General Bankruptcy Counsel for the Debtor-in-Possession** retroactive to February 16, 2024, and for any other relief that it deems just and proper.

Respectfully Submitted:

/s/ Steven A. Leahy

Steven A. Leahy

The Law Office of Steven A. Leahy, PC
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Bannockburn, Illinois 60015
(312) 664-6649
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